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June 19, 2015

**VIA ECF**

Honorable James Donato  
United States District Judge  
United States Courthouse  
Courtroom 11, 19th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

***Re: In re Capacitors Antitrust Litigation, Master File No. 14-cv-03264-JD***

Your Honor:

Defendants, Direct Purchaser Plaintiffs (“DPPs”), and Indirect Purchaser Plaintiffs (“IPPs” and, together with DPPs, “Plaintiffs”) (Defendants and Plaintiffs, collectively, the “Parties”) submit this joint report concerning the status of the Parties’ negotiation of search terms. As agreed to by the Parties, and ordered by the Court in its June 8, 2015 Order (Dkt#735), the Parties have negotiated and reached agreement on a general set of search terms to be applied to Defendants’ Electronically Stored Information, and are reserving their rights to revise or modify agreed-upon search terms on a defendant-by-defendant or custodian-by-custodian basis as contemplated in their Joint Statement Re Case Schedule (Dkt#730, fn.1). The Parties anticipate reducing their agreements to writing soon.

Certain Defendants and Plaintiffs are in the process of negotiating custodian-specific search terms. To the extent any issues over those search terms cannot be resolved informally as between Plaintiffs and any Defendant (or set of Defendants on a common issue), the Parties agree that they will simultaneously submit letter briefs of no more than two pages.

Respectfully submitted,

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Pursuant to Civil L. R. 5-1(e)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories above.

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